

(b) (5)

10/26/15 Meeting w/ Sierra Club (multiple attendees listed)

SC - Labedoc - highest SO₂ emitter in MO?

- implementation of SO₂ NAAQs - Jeff Co doesn't meet CAA

- recommendation to Labedoc doesn't meet CAA

① Jeff Co SIR
overdue EPA
plan to do
- EPA went on record that Jeff Co doesn't meet CAA - MNDNR didn't address

② Labedoc - MO unclassifiable doesn't comply w/ guidelines / science

- Labedoc making showed higher than MNDNR - but they acknowledged it
to show below NAAQS

- SC urges NA

③ Monitoring locations @Labedoc E&G/DNR

- Rush Island - proposed 3 locations to MNDNR - not installed - SPM members not

To limit use - EPA proposed model shows more effective than MONSEC
to different boundaries - future technical support and data are requested

- used reasonable boundary suggestion & sensible such proportion
- also add modelly fun - (EPA proposed). likely from MONSEC
(no changes from Tech could see MONSEC)
- lower bound suggested to be at 0.01 m/s (lower bound)

- lower - used different approach from MONSEC

- SC used diff method - likely probably in Franklin County

- 89 ppb - helped in Franklin & Schenectady County

- no measured nitrate in shell - which prompted use of conservative
NAA - bound on model

use of reasonable diff here - so low to rely on model

- CAA - used strategy due to compare to actual NAAEC - didn't have to

② Lb-dic - Lound 2

- more if up in quantity

conservativeness or dispersion

SC = task - is the EPA to reject TAC SIP even though

so little measuring likely added

- will be bound by CD or DRC if likely exceed this result -

- likely to add - will not be rejected (will like reason)

NAA - this is CAA restriction -

No EPA guidance actually has to change back to all in one - in entire

- although often done for sand on sand, here is 0.04% of NAA - likely

used as sand not allowable for likely reasons

- although - the current lower allowable will meet all in one

didn't use CAA - MONSEC did not respond or correct

- EPA submitted public comments - unusual - EPA said

① JaffCo SIP - Lound 1

and approved or no / in peak concentrations

- 5% NAA numbers not subject to EPA approval - can't go back & start

③

300
Lb-dic

(3)

- Ameren also regard emissions from different units into single point dispersion technique that shouldn't be allowed based on 2010 PSD guidance?
- MO relied on state law - 643.630 - to favor monitoring over modeling
- Iaerdic - large populations of people are in hot spots

(3) Monitors

- Ameren ^{Iaerdic} ^{nonattainment step} commits show that they are planning to use monitors to avoid designation
- believe location of monitors is not correct b/c not at pt. of peak concentrations
- it uses Jefferson City data site - St. Charles monitor close, ~~Jefferson City~~
- ~~Valley Site~~ inappropriate
- it uses Chestnut Hill airport data - neither monitor in areas of peak concentrations
- SC submitted two comments letters on these mon. locs (in September 2015?)
- intent is to upgrade 8 PPM monitors to SLAMs once DRR kicks in
↳ EPA decision to oppose ^{SCA would have to approve, seems like burden to say no even if in place}

Acknowledges Ameren ASAP will data from monitors not used for regulatory purposes

Mile - we commented to MNRL or these SPMs bypass that the monitoring network plan & overlap of SO2 requirements

(* need to work w/ Mile Davis on monitoring network approval & comments)

(4) Rush Island Monitors (not yet installed)

- SC - EPA has to comment on these in - always - request to install them is part of Jeff Co SIP w/ contingency measure
- locations were part of agreement -- but MNR has now opposed those locations
- MNR did not fully evaluate these locations

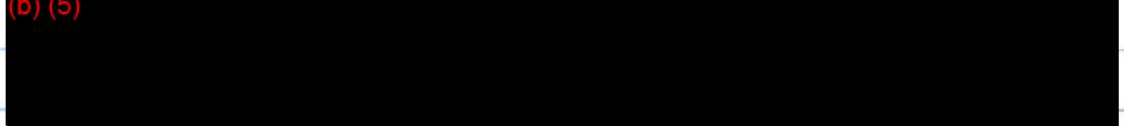
- monitor in this highest concentration area south of source - on Holcim property?

- there across River in correct place

- other 2 monitors are not ~~close~~

- monitors are in 75-80% hotspot locations, rather than 100% - would be easier here to install monitors - don't see obvious physical limitations for placing monitors here
- MNR didn't use full receptor grid
 - * look @ Figure 5 in July 20 SC letter - shows high concentration areas
- Answer doesn't address whether they attempted to install monitors in hot spots - no justification
- Ask went EPA to say more than just for Lebedie - but even if we do - MNR will try to base on all 3 yrs. of clean data

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- Lebedie has no public plans to install receptors on Lebedie - the end game is to use monitors for clean data